

L. Vartain Horn Decl.

Exhibit 4

1 Laura Vartain Horn (SBN 258485)
2 **KIRKLAND & ELLIS LLP**
3 555 California Street, Suite 2700
4 San Francisco, CA 94104
5 Telephone: (415) 439-1625
6 laura.vartain@kirkland.com

7 Allison M. Brown (Admitted *Pro Hac Vice*)
8 **KIRKLAND & ELLIS LLP**
9 2005 Market Street, Suite 1000
10 Philadelphia, PA 19103
11 Telephone: (215) 268-5000
12 alli.brown@kirkland.com

13 Jessica Davidson (Admitted *Pro Hac Vice*)
14 **KIRKLAND & ELLIS LLP**
15 601 Lexington Avenue
16 New York, NY 10022
17 Telephone: (212) 446-4800
18 jessica.davidson@kirkland.com

19 *Attorneys for Defendants*
20 UBER TECHNOLOGIES, INC., RASIER, LLC,
21 and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF RANDY
LUSKEY**

This Document Relates to:
All Cases

DECLARATION OF RANDY LUSKEY

I, Randy Luskey, declare the following:

1. I am over the age of 18 and am a resident of Orinda, California.

2. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”). I am a member in good standing of the Bar of the State of California. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

3. I have reviewed the article relating to this litigation that appeared in the *New York Times* on August 6, 2025 (hereinafter “Article”).

4. After review of the Article, I contacted each Paul, Weiss attorney and staff member who, based on a reasonable investigation, may have had access to the compilation of sealed documents/exhibits (or a significant subset thereof) submitted in connection with Plaintiffs’ summary judgment opposition in the JCCP. Each of those attorneys and staff members confirmed that they had not shared or in any way provided access to any of the documents referenced in the Article to the *New York Times* or its agents, either directly or indirectly.

5. In addition, I hereby confirm that I have not shared or in any way provided access to any of the documents referenced in the Article to the *New York Times* or its agents, either directly or indirectly.

I declare under penalty of perjury under the laws of the State of California and the laws of the United States of America that the foregoing is true and correct.

Executed on August 12, 2025, in San Francisco, CA.



Randy Luskey